

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NEWPORT NEWS DIVISION**

<b>JOANN WRIGHT HAYSBERT,</b>	)	Case No.: 4:20-cv-00121-RBS-DEM
	)	
Plaintiff,	)	Assigned to
	)	Magistrate Judge Douglas E. Miller
	)	
v.	)	[Filed concurrently with Memo of
	)	Points & Authorities; Declaration of
<b>BLOOMIN' BRANDS, INC., et al.</b>	)	Nazareth M. Haysbert and Exhibits
	)	thereto; Declaration of Randall Atlas;
Defendants.	)	[Proposed] Order]
	)	

**PLAINTIFF’S MOTION TO RE-OPEN FACT DISCOVERY AND EXTEND  
EXPERT DISCOVERY DEADLINES**

**TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF  
RECORD:**

PLEASE TAKE NOTICE THAT Plaintiff Joann Wright Haysbert (“Plaintiff”) hereby moves this Court to re-open Plaintiff’s fact discovery period for a reasonable amount of time to conduct specific, limited discovery regarding the work order document produced by Defendants in June 2021, and to extend Plaintiff’s deadline for disclosure of liability experts and expert reports accordingly with the re-opened discovery period.

This Motion is based on the Memorandum of Points and Authorities, the Declaration of Nazareth M. Haysbert, and Exhibits thereto, the [Proposed] Order, the files and records in this case, and any evidence and oral argument as may be presented at the hearing on this Motion.

DATED: July 30, 2021

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**CERTIFICATE OF SERVICE**

*JOANN WRIGHT HAYSBERT v. BLOOMIN' BRANDS, INC., et al.*, Case No.:  
4:20-cv-00121-RBS-DEM

I hereby certify that on this July 30, 2021, a true and accurate copy of the foregoing was sent via email:

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